

for the



V.

Defendant(s)

Civil Action No. 20cv6032

s/ Aaron I. Herrera
Signature of Clerk or Deputy Clerk

Civil Action No. 20cv6032

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

is 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the use of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. PLAINTIFFS

AMER SULIEMAN

County of Residence of First Listed Plaintiff Richmond
(EXCEPT IN U.S. PLAINTIFF CASES)

Attorneys (Firm Name, Address, and Telephone Number)

J. Iandolo Law, PC 7621 13th Avenue Brooklyn NY
11228 718.305.1702

DEFENDANTS

Jebara Igbara, Motashem R. Khalil and Joumana Danou

County of Residence of First Listed Defendant Bergen
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

BASIS OF JURISDICTION (Place an "X" in One Box Only)

U.S. Government Plaintiff ☐ 3 Federal Question
(U.S. Government Not a Party)

U.S. Government Defendant ☒ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
0 Insurance	PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
0 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
0 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability			<input type="checkbox"/> 400 State Reapportionment
0 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander			<input type="checkbox"/> 410 Antitrust
0 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability			<input type="checkbox"/> 430 Banks and Banking
1 Medicare Act	<input type="checkbox"/> 340 Marine			<input type="checkbox"/> 450 Commerce
2 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability			<input type="checkbox"/> 460 Deportation
3 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle			<input type="checkbox"/> 470 Racketeer Influenced Corrupt Organization
0 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability			<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 16)
0 Other Contract	<input type="checkbox"/> 360 Other Personal Injury			<input type="checkbox"/> 485 Telephone Consumer Protection Act
5 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice			<input type="checkbox"/> 490 Cable/Sat TV
6 Franchise				<input type="checkbox"/> 850 Securities/Commodities Exchange
	PERSONAL INJURY			<input type="checkbox"/> 890 Other Statutory Act
	<input type="checkbox"/> 365 Personal Injury - Product Liability			<input type="checkbox"/> 891 Agricultural Acts
	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability			<input type="checkbox"/> 893 Environmental Matters
	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability			<input type="checkbox"/> 895 Freedom of Information Act
	PERSONAL PROPERTY			<input type="checkbox"/> 896 Arbitration
	<input type="checkbox"/> 370 Other Fraud			<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal Agency Decision
	<input type="checkbox"/> 371 Truth in Lending			<input type="checkbox"/> 950 Constitutionality of State Statutes
	<input type="checkbox"/> 380 Other Personal Property Damage			
	<input type="checkbox"/> 385 Property Damage Product Liability			
	PRISONER PETITIONS			
	Habeas Corpus:			
	<input type="checkbox"/> 463 Alien Detainee			
	<input type="checkbox"/> 510 Motions to Vacate Sentence			
	<input type="checkbox"/> 530 General			
	<input type="checkbox"/> 535 Death Penalty			
	Other:			
	<input type="checkbox"/> 540 Mandamus & Other			
	<input type="checkbox"/> 550 Civil Rights			
	<input type="checkbox"/> 555 Prison Condition			
	<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			
	REAL PROPERTY			
0 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights			
0 Foreclosure	<input type="checkbox"/> 441 Voting			
0 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment			
0 Torts to Land	<input type="checkbox"/> 443 Housing/Accommodations			
5 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment			
0 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other			
	<input type="checkbox"/> 448 Education			
	CIVIL RIGHTS			
	<input type="checkbox"/> 440 Other Civil Rights			
	<input type="checkbox"/> 441 Voting			
	<input type="checkbox"/> 442 Employment			
	<input type="checkbox"/> 443 Housing/Accommodations			
	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment			
	<input type="checkbox"/> 446 Amer. w/Disabilities - Other			
	<input type="checkbox"/> 448 Education			
	LABOR			
	<input type="checkbox"/> 710 Fair Labor Standards Act			
	<input type="checkbox"/> 720 Labor/Management Relations			
	<input type="checkbox"/> 740 Railway Labor Act			
	<input type="checkbox"/> 751 Family and Medical Leave Act			
	<input type="checkbox"/> 790 Other Labor Litigation			
	<input type="checkbox"/> 791 Employee Retirement Income Security Act			
	IMMIGRATION			
	<input type="checkbox"/> 462 Naturalization Application			
	<input type="checkbox"/> 465 Other Immigration Actions			
	PROPERTY RIGHTS			
	<input type="checkbox"/> 820 Copyrights			
	<input type="checkbox"/> 830 Patent			
	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application			
	<input type="checkbox"/> 840 Trademark			
	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016			
	SOCIAL SECURITY			
	<input type="checkbox"/> 861 HIA (1395ff)			
	<input type="checkbox"/> 862 Black Lung (923)			
	<input type="checkbox"/> 863 DIWC/DIWW (405(g))			
	<input type="checkbox"/> 864 SSID Title XVI			
	<input type="checkbox"/> 865 RSI (405(g))			
	FEDERAL TAX SUITS			
	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)			
	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609			

ORIGIN (Place an "X" in One Box Only)

Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. § 1332

Brief description of cause:

Fraudulent Inducement, Fraud, Breach of Contract, Conversion, Unjust enrichment

REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
390,000

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

I. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

SIGNATURE OF ATTORNEY OF RECORD

/s/ Jeremy M. Iandolo

1/2020

OFFICE USE ONLY

exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration ☐

Jeremy M. Landolo, counsel for Amer Suleman, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

☒
☐
☐

monetary damages sought are in excess of \$150,000, exclusive of interest and costs,
 the complaint seeks injunctive relief,
 the matter is otherwise ineligible for the following reason

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more of its stocks:

N/A

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is 'related' to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that "A civil case shall not be deemed 'related' to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be 'related' unless both cases are still pending before the court."

NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)

- .) Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County? ☐ Yes ☒ No
- .) If you answered "no" above:
- a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County? ☐ Yes ☒ No
- b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District? ☒ Yes ☐ No
- c) If this is a Fair Debt Collection Practice Act case, specify the County in which the offending communication was received: NA ☒

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County? ☐ Yes ☒ No

(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.

☒

Yes

☐

No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?

☐

Yes

(If yes, please explain

☐

No

I certify the accuracy of all information provided above.

